

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
(Richmond Division)

In re:

SHRIDHAR V. BHAT,

Case No. 19-31691-KLP

Debtor.

TDMA, LLC,

Plaintiff,

Adv. Proc. No. 19-03072-KLP

v.

SHRIDHAR V. BHAT,

Defendant.

**STIPULATION AND PROTECTIVE ORDER**

Harry Shaia, Jr. (the “Trustee”), Shridhar V. Bhat (the “Debtor”), Robert Bhat, Linda Bhat (“Mrs. Bhat”), and TDMA, LLC (“TDMA”), by and through their respective attorneys, hereby enter into, and submit for the Court’s approval and entry, this Stipulation and Protective Order (“Protective Order”) for the protection of certain material and information during the course of the mediation to which this Order applies (the “Mediation”).

1. On December 16, 2019, the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division, entered its Order Granting Judicial Mediation (the “Mediation Order”) for this case, appointing the Honorable Frank J. Santoro as the judicial mediator (the “Mediator”).

---

Christian K. Vogel (Va. Bar No. 75537)  
Vogel & Cromwell, L.L.C.  
513 Forest Ave., Suite 205  
Richmond, VA 23229  
(804) 728-1574  
kvogel@vogelandcromwell.com

*Counsel to Harry Shaia, Jr., Trustee*

2. The mediator has requested that the Debtor and Mrs. Bhat authorize First Community Bank to provide the 2018 personal financial statement completed by the Debtor and Linda Bhat (the "2018 PFS") to the Trustee and to counsel for TDMA.

3. The Mediator has further requested that the Debtor provide to counsel for TDMA evidence as to the current status of payment of premiums on any life insurance policies in which he holds an interest (the "Life Insurance Information").

4. The Debtor and Mrs. Bhat are hereby ordered and directed to cause the 2018 PFS to be provided to the Trustee and counsel for TDMA. The Debtor is hereby ordered and directed to provide to counsel for TDMA the Life Insurance Information.

5. The parties hereto agree that the 2018 PFS and Life Insurance Information (collectively, the "Material") shall be kept confidential within the Mediation and may not be disclosed or utilized in any respect other than during and in connection with the Mediation unless and until the Material may be obtained under procedures provided for in the United States Bankruptcy Code and/or the Federal Rules of Civil Procedure or the Court orders otherwise.

IT IS SO ORDERED.

ENTERED:

  
FRANK J. SANTORO, CHIEF JUDGE

Entered On Docket: Mar 18 2021

We ask for this:

/s/ Jeremy S. Williams (with permission by e-mail dated 3.17.21)

Jeremy S. Williams (VSB No. 77469)

Kutak Rock LLP

901 East Byrd Street, Suite 1000

Richmond, Virginia 23219

(804) 644-1700

Jeremy.williams@kutakrock.com

*Counsel for TDMA, LLC*

/s/ Christian K. Vogel

Christian K. Vogel (VSB No. 75537)

Vogel & Cromwell, L.L.C.

513 Forest Ave., Suite 205

Richmond, VA 23229

(804) 728-1574

kvogel@vogelandcromwell.com

*Counsel for Harry Shaid, Jr., Trustee*

/s/ David R. Ruby (with permission by e-mail dated 3.17.21)

David R. Ruby (VSB No. 22703)

Thompson McMullan, P.C.

100 Shockoe Slip, Third Floor

Richmond, VA 23219

(804) 698-6220

druby@t-mlaw.com

*Counsel for Robert Bhat and Linda Bhat*

/s/ Steven S. Biss (with permission by e-mail dated 3.17.21)

Steven S. Biss (VSB No. 32972)

Law Office of Steven S. Biss

300 West Main Street, Suite 102

Charlottesville, VA 22903

(540) 501-8272

stevenbiss@earthlink.net

*Counsel for Debtor*

### **LOCAL BANKRUPTCY RULE 9022-1(C) CERTIFICATION**

Pursuant to Local Bankruptcy Rule 9022-1(C), I hereby certify that the foregoing proposed order has been endorsed by or served upon all necessary parties.

/s/ Christian K. Vogel  
Counsel